

1 WILLIAM H. BROWN, ESQ. (7623)
2 BROWN MISHLER, PLLC
3 911 N. Buffalo Dr., Ste. 202
4 Las Vegas, Nevada 89128
5 Tel: (702) 816-2200
6 Email: WBrown@BrownMishler.com
7 *Attorney for Defendant*
8 *Pedro Montalvo*

9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 vs.

14 ADALI ARNULFO ESCALANTE-
15 TRUJILLO, et al.,

16 Defendants.

2:20-cr-00156-RFB-DJA

**UNOPPOSED MOTION TO
ALLOW TRAVEL**

17 Certification: This motion is timely filed.

18 Comes now the defendant, Pedro Montalvo, by and through his counsel
19 of record, William Brown, of BROWN MISHLER, PLLC, and hereby moves
20 this Court for permission to remain in California after pre-approved travel to
21 attend a family funeral. This request is based on the Points and Authorities
22 attached hereto.
23

24 Dated: March 29, 2021

25 By /s/ William H. Brown
26 WILLIAM H. BROWN
27 *Attorney for Pedro Montalvo*
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**MEMORANDUM OF
POINTS AND AUTHORITIES**

Defendant Pedro Montalvo's pretrial release conditions allow him to travel to California on certain dates, including as relevant here April 2-5, 2021. To attend his grandmother's funeral while avoiding additional unnecessary travel costs, Mr. Motalvo asks that he be allowed to extend his pre-approved travel and to remain in California until April 9, 2021.

The defense has communicated with Montalvo's Pretrial Services Officer, and the government, and neither opposes this request.

Dated: March 29, 2021

By /s/ William H. Brown
WILLIAM H. BROWN
Attorney for Pedro Montalvo

CERTIFICATE OF ELECTRONIC SERVICE

The undersigned hereby certifies that he is an employee of BROWN MISHLER, PLLC, and is a person of such age and discretion as to be competent to serve papers, and that on March 29, 2021 he served an electronic copy of the above and foregoing **UNOPPOSED MOTION TO ALLOW TRAVEL** by electronic service (ECF)

/s/ William Brown
Employee of BROWN MISHLER,
PLLC

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7 *Attorney for Defendant*
8 *Pedro Montalvo*

9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA

11 UNITED STATES OF AMERICA,

2:20-cr-00156-RFB-DJA

12 Plaintiff,

[PROPOSED]

13 vs.

ORDER ALLOWING TRAVEL

14 ADALI ARNULFO ESCALANTE-
15 TRUJILLO, et al.,

16 Defendants.

17 Having considered defendant Pedro Montalvo's unopposed motion for
18 travel, it is hereby ordered that the motion is granted, such that Montalvo
19 may travel California April 2, and may remain there until April 9, 2021.
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21 Dated: March 31, 2021

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24 RICHARD F. BOULWARE, II
25 UNITED STATES DISTRICT JUDGE
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